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Department of
Agriculture

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Food and
Consumer
Service

Mountain Plains Region
Reply to
Attn. of: SP 99-01

1244 Speer Blvd.
Denver, CO
80204-3581

Subject: Third Set of Questions and Answers (Q&As) on the School Meals Initiative (SMI) for Healthy Children

To: STATE AGENCY DIRECTORS - Colorado ED, Iowa, Kansas,
Missouri ED, Montana OPI,
Nebraska ED, North Dakota,
South Dakota, Utah, and
Wyoming ED

Attached is the third set of answers to questions submitted to us on the SMI. This set contains general questions on overall SMI policies and procedures. We will issue a separate set of Q&As concerning SMI monitoring at a later date.

If you have any questions, please contact our office.

Ann C. DeGroat

ANN C. DEGROAT
Regional Director
Child Nutrition Programs

Attachment

cc: CO Health, MO Health, MT Health, and WY Health

General SMI Questions and Answers: Set 3

Nutrition Standards and Nutrient Analysis

1Q. The SFA or school receives vended meals from another source. How is compliance with the nutrition standards determined?

A. If the receiving SFA uses the NSMP approach, it needs: enough information from the vendor to conduct a nutrient analysis; or a nutrient analysis from the vendor which could be another SFA using the NSMP approach.

If the SFA or school uses one of the food-based approaches, the State agency must be able to obtain sufficient information to conduct a nutrient analysis as part of the SMI monitoring review. The SFA or school needs to insure that the vendor can provide the information necessary to conduct an SMI assessment review. No matter which menu planning option the SFA or school selects, the contract with the vendor needs to include a provision that specifies what information is required for the State agency to conduct a nutrient analysis and that the vendor must provide all of that information.

2Q. A dessert item or fruits or vegetables are offered after the point of service as extras. Should these items be included in the nutrient analysis?

A. A complete meal with all of the appropriate components, menu items or food items must be offered prior to the point of service. A determination must be made at the point of service that a child has selected a reimbursable meal with at least the minimum number of required items or components. Foods offered beyond the point of service must be included in the nutrient analysis based on estimates of the contribution such foods make to the reimbursable meal service.

3Q. While specific standards for sodium, cholesterol and dietary fiber have not been established, the regulations do require

improvement in these areas. How can we help SFAs and schools to improve in these areas without standards?

A. The Dietary Guidelines did not establish target levels for sodium, cholesterol, and dietary fiber because there is currently no consensus within the scientific community regarding recommended amounts for consumption. While there is no consensus, there are a number of different groups that have developed recommendations in these areas. For example, the School Nutrition Dietary Assessment Study (SNDA) used the recommendations of the National Research Council, published in Diet and Health as benchmarks for assessing intakes of sodium, cholesterol, and carbohydrate.

However, it is not necessary to set specific standards to bring about improvement in these areas. During their initial reviews, SFAs may identify the current levels for these elements in the planned menus. During the next review(s), the SFA would compare the levels from that nutrient analysis to those found in the previous review(s) to determine if there was improvement in reducing sodium and cholesterol and in increasing dietary fiber.

Residential Child Care Institutions (RCCIs) and Special Needs Situations

4Q. In some RCCIs, it is standard practice to use leftovers from the previous dinner as extras for lunch. The amount leftover varies each time. Is it sufficient to do the nutrient analysis on the planned menu and not include the leftovers?

A. Yes.

5Q. If the only change in food provided to a child with special needs is the form or consistency, are these meals included in the nutrient analysis?

A. Yes.

6Q. If the diet ordered for a child with special needs changes the level of calories or other nutrients, are these meals included in the nutrient analysis?

A. No.

NSMP versus ANSMP

7Q. When is the SFA considered to be using the ANSMP approach?

A. ANSMP is an approach in which menu cycles are developed by entities other than that SFA. The SFA is considered to be using the ANSMP approach when it purchases or receives the menu cycle(s) with the recipes, product specifications and preparation techniques that support those menu cycles and the resulting nutrient analyses.

If the SFA develops its own menu cycles, recipes, etc. but has another entity (such as a university) or a central system (like the headquarters of an FSMC) do the actual analysis, it is not considered a ANSMP system.

NSMP Systems

8Q. When an NSMP SFA conducts a nutrient analysis, what food quantities should be used—the planned, prepared, or served amounts?

A. The planned quantities from the production records or other types of planning records are used. If any significant changes are made to the menu or to production levels, a new analysis is needed.

9Q. Must the numbers of a la carte sales, special needs and adult meals that are excluded from the nutrient analysis be documented?

A. We suggest that SFAs develop estimates from production records, meal counts, observations, etc. Whatever method is used should be noted for review purposes. The SA is not required to document the accuracy of the estimates, but may

determine, during the review, that the estimates should be adjusted.

10Q. How are family style meals handled for nutrient analysis?

A. Nutrient analysis is based on food production and the number of planned servings. When planning family style meals, overall production and the number of children to be served is determined. Therefore, the analysis would be done in the same way as for non-family style meals, even though there is greater opportunity for varying portions. If a school is serving family style meals under NSMP or ANSMP, there must be sufficient quantities of food to ensure that a reimbursable meal is available to each child.

11Q. Can the SFA use the milk variety "recipe" (which sets standard percentages of whole, low-fat, or flavored milk) that is included in some software packages?

A. Any such recipe must be adjusted to the available varieties in the appropriate proportions offered at the school or SFA. Please note that variety recipes may also be created for other situations where the same food items are offered together and are selected in about the same quantities; e.g., bread baskets, fresh fruit bowls, condiments, cold cereals, etc.

12Q. For NSMP systems, are leftovers included in the analysis? Must the menus for the week be reanalyzed to include leftovers?

A. We do not require that leftovers be incorporated into the analysis or that a reanalysis for that week be done. However, if the leftovers are needed to verify that reimbursable meals were offered, the SFA must document how the leftovers were used, either by amending or annotating the production records. We encourage SFAs to consider if the leftovers, particularly the same foods, are a frequent occurrence and to make appropriate changes or adjustments to production levels.

Food-based Menu Planning Systems

13Q. Is yogurt subject to the crediting limitation of 50% that applies to nuts and seeds when used as a meat alternate?

A. No, yogurt is not subject to this limitation. Four ounces (weight) or one-half cup (volume) of yogurt equal one ounce of the meat/meat alternate requirement. Therefore, the amounts listed for yogurt in the charts of minimum quantities meet the full, minimums required for the meat/meat alternate component. For example, under the traditional food-based menu planning alternative, six ounces or $\frac{3}{4}$ of a cup of yogurt provide the full meat/meat alternate requirement for children in K-3.

14Q. For food-based approaches, must leftovers be included on the production record so that the SA may include them in the nutrition assessment review?

A. As we discussed in Number 12, leftovers that are needed to verify that reimbursable meals were offered, must be documented, either by amending or annotating the production records. However, if the leftovers are not essential to document reimbursable meals, the SFA may, but is not required to, include leftovers on their production records.

Breads/Grains

15Q. What constitutes a serving of a grains/breads item?

A. Basically, a serving is a slice of bread or one-half cup of pasta or cereal grains. Please see Appendix A of FCS Instruction 738-1, Revision 2, The Grains/Breads Requirement for the Food-Based Menu Planning Alternatives in the Child Nutrition Programs, for specific details.

16Q. What is the minimum amount that may be credited towards a grains/breads item?

A. The smallest creditable amount of a grains/breads food item is one-fourth of a serving.

17Q. What is the minimum amount of a grains/bread item that can be credited as an item for a reimbursable meal?

A. The minimum amount is one full serving as defined in the grains/breads instruction discussed in Number 15. At the point of service, the student must have the equivalent of a full serving of grains/breads in order to have met the grains/breads component requirement for a reimbursable meal.

For example, if the child has a salad that contains a one-fourth cup of pasta (one-half of the "full" serving of pasta), the student must have another item that is at least one-half of a serving of another grain/bread item in order to have a reimbursable meal. Cashiers must be aware of what individual items constitute the minimum daily serving for this component and which constitute only a part of the minimum daily serving and must be supplemented with another grain/bread item to meet a "full" serving.